

ORIGINAL

001470

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

AUG 20 4 20 PM '98

MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS GARVEY TO CONCERNS RAISED
DURING ORAL CROSS-EXAMINATION ON
AUGUST 26, 1998

The United States Postal Service hereby provides the response of witness Garvey to concerns expressed by the Presiding Officer during oral cross-examination on August 26, 1998.

Each question is paraphrased from the transcript and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

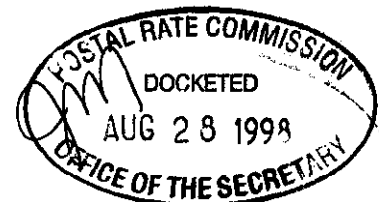
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies

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August 28, 1998



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO CONCERNS RAISED DURING CROSS EXAMINATION 001471

In my Response to OCA/USPS-T1-17, part (a), I stated that I had calculated that during the operations test, for regular mail-merge mailings with on-line proofing, there are 75 possible categories of batches within each possible page count combination. Counsel for OCA asked for a verification of that number at Tr. 178.¹

RESPONSE:

After subsequent discussions with the technical designer and a review of the elements involved in defining the batches, I have recalculated the number of possible of batches to be 42. This was arrived at by the following calculation:

Letter & legal 2 possible plex options – simplex or duplex
 x 2 possible binding options – stapled or not stapled
 4
 x 2 possible paper sizes – letter or legal
 8
 x 5 possible color options – black, red, green, blue, magenta
 40

Newsletter 1 possible plex option – duplex
 x 2 possible binding options – stapled or not stapled
 2
 x 1 possible paper size – newsletter (11"x17")
 2
 x 1 possible color options – black
 2

I am unable to explain where the error occurred in calculating the previous number.

¹ This citation (and others in these responses) is to the transcript for August 26, 1998, erroneously identified as Volume 1. While a replacement transcript is being prepared, it is not yet available for citation.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO CONCERNS RAISED DURING CROSS EXAMINATION

001472

Counsel for the OCA requested a determination of whether the data file generated by the Mailing Online system, which is currently used by PriceWaterhouseCoopers to produce reports, contains sufficient information to come up with the different job types identified in my Response to OCA/USPS-T1-17 (a). Tr. 200.

RESPONSE:

After discussions with the system developer I was able to discover that as currently configured the data file generated by the system does not contain sufficient information to determine different job types. However, in the new version of the system due to be implemented for the market test, a modification will be made to complete the data set so that such a determination can be made.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
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001473

Counsel for MASA requested that a determination be made of the possible frequency for reporting help desk data as it relates to Mailing Online. Tr. 225.

RESPONSE

Currently, raw data on help desk usage is sent weekly by mail to PriceWaterhouseCoopers to be used in an Accounting Period PostOffice Online report. The data includes information to enable specific reporting on Mailing Online and could possibly be formatted for a weekly report. However, the delay in receipt of weekly data files via mail would make it difficult to provide the information with the same dispatch as other reports being generated from electronic data feeds.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO CONCERNS RAISED DURING CROSS EXAMINATION 001474

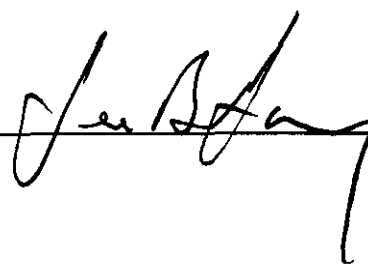
Counsel for MASA asked whether copies of the mailing statements and reports generated by the sortation software in Mailing Online could be obtained before being sent to the printer and reported to the Commission. Page 232.

RESPONSE:

According to the system developer, these mailing statements and reports are currently not stored in the system nor is there any provision for printing them at the data site. Obtaining the copies from the printer would be the only method available today for acquiring them. I am told it would be possible to modify the system so as to store and forward the reports, but that it would require modifications to the software for a future release.

DECLARATION

I, Lee Garvey, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



Dated: 8/28/98

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

K N Hollies
Kenneth N. Hollies

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